

DEC - 6 2018

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

SHERIF SADIK,

Defendant.

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No.

4:18CR01009 RLW/SPM

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Matthew T. Drake, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with one count of prohibited person in possession of a firearm, in violation of 18 U.S.C. § 922(g)(4).
2. Pursuant to Title 18, United States Code, Section 3142(g),
 - (a) The weight of the evidence against defendant is significant. In this case, the United States has substantial evidence of the defendant's involvement in, and commission of, the alleged offense;

(b) the defendant has personal history and characteristics (including residential, medical and employment status) that poses risks for his ability to meet conditions of bond, remain on bond, and attend court appearances; and

(c) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial, as identified in paragraph 4.

3. There is a serious risk that the defendant will flee. The defendant is not a United States citizen, he is a legal permanent resident. He has recently travelled to Washington D.C. in attempts to secure travel documentation and a passport. He has recently indicated his strong desire to leave the United States and travel back to his country of origin where he has family. He has also expressed a desire to remain abroad and not return to the United States.

4. The defendant is a threat to the community. The defendant has been and remains a repeated concern for threatening public officials, elected representatives, and others. He traveled in furtherance of these endeavors and has been involved in altercations and criminal legal actions, all of which make him a threat to the community.

5. There is a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness or juror.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
UNITED STATES ATTORNEY

/s/Matthew T. Drake

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